

**Remarks**

Claims 1, 5-6, 8, 10-14, 18-20 and 23-25 are pending. Claims 2-4, 7, 9, 15-17 and 21 are canceled in this Response. The cancellation of these claims is not related to any objection or rejection asserted by the Examiner. Rather, these claims are canceled because (1) the limitations were incorporated into another claim, (2) they covered subject matter covered by other claims or subject matter claimed in a co-pending and commonly owned related case (application serial no. 09/620,957), or (3) they depended from a canceled claim.

***Claim Objections***

Claim 3 has been canceled. The objection to Claim 14 is moot in view of the amendment to that claim.

***Rejections Under Section 112***

Claims 3 and 4 have been canceled. The rejection of Claim 2 under Section 112 is moot in view of the amendment to Claim 1.

***Claim Terms Specially Defined In The Specification***

It is well settled that an applicant may be his own lexicographer. The Examiner is obligated to apply in the claims the definition of a term specially defined by the applicant in the Specification. MPEP 2173.05(a). It necessarily follows, therefore, that the applicant does not have to repeat in the claim the definition given to a term in the Specification.

"Form" is specially defined in the Specification as an image that occurs more than once in a document. Specification, page 1, lines 17-20. Applicant, therefore, does not have to recite in the claims "a form which is an image that occurs more than once in a document." Rather, it is enough to simply recite "a form" which, by definition, means an image that occurs more than once in a document.

***Rejections Based On Gauthier and Vidyanand***

All pending claims stand rejected under Section 102 and 103 as being anticipated by or obvious over Gauthier (6243172) or Vidyanand (6330071), or both. The Applicants acknowledge with appreciation the detailed remarks made by the Examiner in support of his position. Applicants respectfully submit, however, that the

references do not teach or suggest all claim limitations, at least not for the amended claims.

Claims 1, 8, 10 and 14 as amended each recite limitations related to processing images that occur more than once in a document according to different printing techniques, depending on which technique is indicated. For example, Claim 1 recites a means for:

(1) responding to the indicator indicating permission is granted to print each instance of the form from the same video data by processing and printing the named sequence according to a first printing algorithm; and

(2) responding to the indicator indicating each instance of the form is to be printed from new video data by processing and printing the named sequence according to a second printing algorithm.

Gauthier and Vidyanand are both directed to printing documents that include fixed data and changing data. In Gauthier, the fixed data is called a template and the changing data is called variable data. Gauthier teaches techniques for merging variable data with a template to print a completed document. In Vidyanand, the fixed data is called the master data and the changing data is called the variable data. Vidyanand teaches techniques for assembling master data and variable data in a single print job.

Even if it is assumed that the fixed data and/or variable data in Gauthier and Vidyanand can represent an image that occurs more than once in a document (i.e., is a "form"), neither of the references teach the dual option printing techniques recited in amended Claims 1, 8, 10 and 14. In amended Claim 1, for example, if the indicator indicates each instance of the recurring image in the document may be printed from the same video data, then a first printing algorithm is used. If, however, the indicator indicates each instance of the form in the document is to be printed from new video data, then a second different printing algorithm is used. In both Gauthier and Vidyanand, a recurring image is printed using the same "algorithm" each time it occurs in a document whether the image is represented by a template/master data or by variable data. There is nothing in any of the passages in Gauthier and Vidyanand cited by the Examiner that suggests different printing algorithms are used to print a single recurring image in a single document based on an indicator that accompanies the

commands describing the document.

Neither Gauthier nor Vidyanand disclose any kind of an indicator that may be set to different values or different indications for a single document to determine how each instance of a recurring image in the document will be handled. It just isn't there. If the Examiner disagrees, he is respectfully requested to specifically point out and explain (1) what element/feature in either or both references constitutes any such indicator and (2) two different printing techniques for printing each instance of a recurring image in a single document. Absent such a showing, the rejections should be withdrawn.


The same analysis applies to Claims 22-25. Claims 22 recites a control unit configured to respond to PDL print commands that include a named sequence describing a form and an indicator by processing the named sequence according to one of three different printing algorithms depending on what the indicator indicates. Claim 25 recites printer firmware that includes programming for responding to PDL print commands that include a named sequence describing a form and an indicator by processing the named sequence according to one of three different printing algorithms depending on what the indicator indicates. Claim 23 recites programming configured to generate PDL print commands that include one of four different indicators. The cited references do not teach or suggest the combinations recited in Claims 22-25.

All pending claims are in condition for allowance. The foregoing is believed to be a complete response to the outstanding Office Action.

Respectfully submitted,

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